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0	UNITED STATES I	DISTRICT COURT	
8			
9	DISTRICT OF NEVADA		
9		GAGENO 2 10 02012 IGN FIN	
10	Nikkei Global, Inc., a California corporation,	CASE NO.: 2:18-cv-02013-JCM-EJY	
10			
11	Plaintiff,	STIPULATION AND ORDER	
	VS.	REGARDING	
12		EXTENSIONS OF TIME:	
10	Co-Partner Consortium ("Partner-CO"), a		
13	Nevada general partnership associated in fact	(1) TO FILE RESPONSE AND REPLY TO	
1.4	and as an enterprise per 18 USCA § 1961(3);	MOTION TO DISMISS [ECF No. 70]; And	
14	Mr. Phillip Ziade, Nevada resident and co-	(A) TO LEAVE DIVINIA DIGGE OCCUPED	
15	partner; Mr. Jude E. Nassar, an individual resident of Clark County, Nevada; Appleton	(2) TO MAKE INITIAL DISCLOSURES	
13	Properties, LLC, a Nevada limited liability	PURSUANT TO JOINT DISCOVERY	
16	company; Z Leb Group, LLC, a Nevada	PLAN [ECF No. 71]	
	limited liability company; Progressive		
17	Construction, Inc. a/k/a Growth Construction,		
1.0	a Nevada corporation; Growth Development,		
18	LLC a/k/a Growth Construction, a Nevada		
19	limited liability company, Vibrant Realty,		
19	LLC, a Nevada limited liability company; AJ		
20	Properties International, LLC, a/k/a AJ1, a Nevada limited liability company; AJ		
	Properties International Series 2 LLC, a/k/a		
21	AJ2, a Nevada limited liability company;		
	Growth Holdings, a Nevada corporation;		
22	Growth Luxury Homes, LLC, a/k/a GLH, a		
22	Nevada limited liability company; Growth		
23	Luxury Realty, LLC, a/k/a GLR, a Nevada		
24	limited liability company; Mr. Yoshimi		
24	Hirooka, a resident of Japan or Singapore,		
25	doing business in Nevada; Mr. Yoshihiro Hirooka, a resident of Japan or Singapore		
	doing business in Nevada; Hirooka Family		
26	Office, Ltd., a foreign organization doing		
	business in Nevada,		
27	·		
	Defendants.		

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STIPULATION AND [PROPOSED] ORDER

Plaintiff Nikkei Global Inc. ("NGI"), and Defendants Phillippe Ziade, Jude Nassar, Appleton Properties, LLC, Z Leb Group, LLC, Progressive Construction, Inc., Growth Development, LLC, Vibrant Realty, LLC, AJ Properties International, LLC, AJ Properties International Series 2, LLC, Growth Holdings, LLC, Growth Luxury Homes LLC, and Growth Luxury Realty, LLC (collectively, the "Ziade Defendants"), by and through their undersigned respective counsel, submit the following Stipulation for the Court's review and approval.

1. ZIADE DEFENDANTS' NEW MOTION TO DISMISS [ECF No. 70]

On October 28, 2019, following this Court's dismissal of some but not all of Plaintiff NGI's claims (*see* Order, ECF No. 68), the Ziade Defendants filed another Motion to Dismiss the remainder of Plaintiff NGI's First Amended Complaint, this time on purely jurisdictional grounds. *See* ECF No. 70. The original deadline for NGI to file its Response to the Ziade Defendants' new Motion to Dismiss was November 11, 2019. *See* LR 7-2(b). Prior to that date, however, NGI requested additional time to prepare and file its Response, and the Ziade Defendants agreed to such request. The Parties agreed that the new deadline should be November 25, 2019. The Parties also agreed that the new deadline for Ziade Defendants' for their Reply is December 13, 2019.

2. THE PARTIES' INITIAL DISCLOSURES

On October 25, 2019, the Parties submitted their proposed Joint Discovery Plan for this Court's approval. *See* ECF No. 69. On October 30, 2019, this Court approved that originally submitted plan. *See* ECF No. 71. The Parties have subsequently agreed, however, that the date for initial disclosures should be extended to December 9, 2019. All other dates in the Plan remain the same and are unaffected by this Stipulation to extend the initial disclosure date.

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1	As such, the Parties stipulate as follows:	
2	(1) Plaintiff NGI shall have until and through November 25, 2019 to file its Response	
3	the Ziade Defendants' new and pending Motion to Dismiss [ECF No. 70];	
4	(2) Ziade Defendants' shall have until and through December 13, 2019 to file its Repl	
5	to NGI's Response to the Ziade Defendants' new and pending Motion to Dismiss [ECF No. 70];	
6	(3) The Parties shall have until and through December 9, 2019, to make their initia	
7	disclosures (with no other dates in the Plan being changed at this time).	
8		
9	DATED: November 14, 2019	
10	FENNEMORE CRAIG, P.C.	BAILEY KENNEDY
11		
12	By: /s/ Richard Dreitzer Richard Dreitzer, Esq., NV Bar No. 6626	By: <u>/s/ Joseph Liebman</u> Joseph A. Liebman, Esq., NV Bar No. 10125
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15	Attorneys for Plaintiff	LAW OFFICE OF MICHAEL LATER Michael M. Later, Esq., NV Bar No. 7416
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19		Attorneys for the Growth Defendants
20		
	ORDER	
21		
22		IS SO ORDERED.
23	UNIDED STATES DISTRICT JUDGE	
24	November 18, 2019	
25	DA	TED:
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